

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

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DEBRA P. HACKETT, CLK.
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

EUNICE AND ROBERT MCKINNES,

Plaintiffs,

vs.

AMERICAN INTERNATIONAL GROUP,
INC.; AMERICAN GENERAL
CORPORATION; AMERICAN GENERAL
FINANCE, INC.; AMERICAN GENERAL
FINANCIAL SERVICES OF ALABAMA,
INC.; AMERICAN GENERAL FINANCE
CORPORATION; MERIT LIFE
INSURANCE COMPANY; YOSEMITE
INSURANCE COMPANY; LISA WOOD;
CONNIE FARMER; and Fictitious
Defendants "A", "B", and "C", whether
singular or plural, those other persons,
corporations, firms, or other entities whose
wrongful conduct caused the injuries and
damages to the Plaintiffs, all of whose true
and correct names are unknown to Plaintiffs
at this time, but will be substituted by
amendment when ascertained,

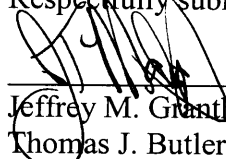
Defendants.

CIVIL ACTION NO.: 2:06cv41-wkw

SPECIAL APPEARANCE - JOINDER AND CONSENT TO REMOVAL

Defendants American International Group, Inc. ("AIG") and American General Corporation ("AGC"), making a special appearance by and through their counsel of record, appear solely for the purpose of joining in and consenting to the removal of this action to the United States District Court for the Middle District of Alabama, Northern Division. In so doing, AIG and AGC do not waive and specifically preserve their defense of lack of personal jurisdiction, as well as other defenses pursuant to Rule 12 of the Federal Rules of Civil Procedure.

Respectfully submitted,



Jeffrey M. Grantham (ASB-4866-M66J)

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Attorneys for Defendants American International
Group, Inc. and American General Corporation

OF COUNSEL:

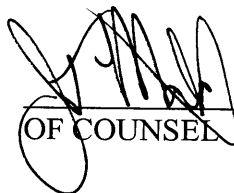
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205-254-1000
205-254-1999 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person, by U. S. Mail, postage prepaid, on this the 17th day of January, 2006:

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